

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

ANTHONY DACRE,
Plaintiff

V.

WHITE WATER SEAFOOD CORP.,
Defendant

travel money.

2. Discovery plan

We believe a two-stage discovery process may be in order in the captioned matter: The first is to give each side an opportunity to evaluate the case, and the second is to, if necessary, prepare for trial.

- A.
 - 1. all amendments to pleadings to be filed on or before 3/31/04.
 - 2. all written discovery propounded pursuant to Fed.R.Civ.P. 26(b) to be served by 4/1/04.
 - 3. all depositions of fact witnesses to be completed on or before 8/31/04; the parties reserve the right during the second stage of this process to preserve their witnesses' testimony for time of trial through video deposition consistent with the Federal Rules of Civil Procedure, Federal Rules of Evidence and Local Rules.
- B. If necessary, stage two would consist of the following:
 - 1. Plaintiff's designation of experts and complete answers to expert interrogatories on or before 9/30/04.
 - 2. Defendant's designation of experts and complete answers to expert interrogatories on or before 10/31/04.
 - 3. Completion of any allowed expert depositions on or before 11/30/04.
 - 4. all dispositive motions to be filed on or before 11/30/04.
 - 5. Final Pretrial Conference some date after 11/30/04.
- 3. Certification pursuant to Rule 16.1(d)(3)

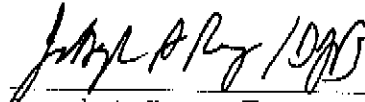
We the undersigned counsel certify that the parties have conferred with their clients with respect to the establishment of a budget for the cost of conducting the full course of the litigation, and the resolution of the litigation by means of alternative dispute resolution.

Respectfully submitted,
Anthony Dacre, Plaintiff,
By his attorney,



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White Water Seafood Corp.,
Defendant,
By its attorneys,



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Dated:

2/24/07